

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

WILLIAM McKINNLEY GARLAND (1)

a/k/a Evangelista, a/k/a Lobo,  
a/k/a Vangelisa, a/k/a Ville,  
a/k/a Lex, a/k/a "V," a/k/a Victor  
Yamaguchi

JALEN ALEXANDER BOBO (2)

SELENA ROSE McCOMBS (3)

a/k/a Harley

ROBBERTA MARIE KHAN (4)

a/k/a Roberta Marie Khan,  
a/k/a Ember, a/k/a Scarecrow

ANASTASIYA CLAIRE LYONS (5)

a/k/a Frosty, a/k/a Elena Frost,  
a/k/a Ana Frost, a/k/a Bane,  
a/k/a Baiine

No. 4:23CR268

Judge Jordan

**FILED**

MAY 14 2025

Clerk, U.S. District Court  
Texas Eastern

**SECOND SUPERSEDING INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 18 U.S.C. §§ 2422(a) & 2  
(Coercion and Enticement and Aiding  
and Abetting)

Between on or about January 21, 2021, and on or about January 27, 2021, in the Eastern District of Texas, and elsewhere, **William McKinnley Garland (a/k/a Evangelista, a/k/a Lobo, a/k/a Vangelisa, a/k/a Ville, a/k/a Lex, a/k/a, "V," a/k/a Victor Yamaguchi), Jalen Alexander Bobo, and Robberta Khan (a/k/a Roberta Marie Khan, a/k/a Ember, a/k/a Scarecrow)**, defendants, did knowingly persuade,

induce, entice, and coerce an individual, and did knowingly attempt to persuade, induce, entice, and coerce an individual, that is, Victim 1, to travel in interstate commerce, from the State of Ohio to the Eastern District of Texas, to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, and aided and abetted in the same.

In violation of 18 U.S.C. §§ 2422(a) and 2.

**Count Two**

Violation: 18 U.S.C. § 1594(c)  
(Conspiracy to Commit Sex Trafficking  
by Force, Fraud, and Coercion)

Between in or about 2020, and continuing until on or about August 5, 2024, in the Eastern District of Texas, and elsewhere, **William McKinnley Garland (a/k/a Evangelista, a/k/a Lobo, a/k/a Vangelisa, a/k/a Ville, a/k/a Lex, a/k/a, "V," a/k/a Victor Yamaguchi), Jalen Alexander Bobo, Selena Rose McCombs (a/k/a Harley), and Anastasiya Claire Lyons (a/k/a Frosty, a/k/a Elena Frost, a/k/a Ana Frost, a/k/a Bane, a/k/a Baiine)**, defendants, in and affecting interstate and foreign commerce, did conspire with each other and with individuals known and unknown to the Grand Jury to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means an individual(s) known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause those individuals to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1).

In violation of 18 U.S.C. § 1594(c).

### **NOTICE OF FORFEITURE**

Pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(1), 18 U.S.C. § 2428(a)(1), 28 U.S.C. § 2461, and 18 U.S.C. §§ 1594(d) & (e), upon conviction of the offense(s) alleged in this Second Superseding Indictment, the defendants, **William McKinnley Garland (a/k/a Evangelista, a/k/a Lobo, a/k/a Vangelisa, a/k/a Ville, a/k/a Lex, a/k/a, "V," a/k/a Victor Yamaguchi), Jalen Alexander Bobo, Selena Rose McCombs (a/k/a Harley), Robberta Marie Khan (a/k/a Roberta Marie Khan, a/k/a Ember, a/k/a Scarecrow), and Anastasiya Claire Lyons (a/k/a Frosty, a/k/a Elena Frost, a/k/a Ana Frost, a/k/a Bane, a/k/a Baiine)** shall forfeit to the United States their interest in all property, real or personal, that constitutes or is derived from proceeds traceable to the aforementioned violations, including but not limited to the following property:

- All proceeds traceable to the aforementioned violations, wherever they may be located, including but not limited to those funds located at or seized from 2713 Sowerby Drive, Plano, Texas, and those funds located in the possession of or seized from third parties;
- 2008 Land Rover Range Rover, bearing Texas license plate TBG3458 and VIN number SALSK25488A183270;
- \$102.81 U.S. currency seized from 2008 Land Rover Range Rover;
- Personal property contained in the 2008 Land Rover Range Rover;
- 2002 Mercedes G Wagon, bearing Texas license plate TGX1981 and VIN number WDCYR49EX2X129477;
- \$9.55 U.S. currency seized from 2002 Mercedes G Wagon;
- Personal property contained in the 2002 Mercedes G Wagon;
- 2003 Dodge Viper, bearing Texas license plate RSF9294 and VIN number 1B3JR65Z73V500413;
- 2014 Mercedes Benz E Class, bearing Texas temporary buyers license plate 410L76 and VIN number WDDKJ5KB5EF248904;
- \$33.54 U.S. currency seized from 2014 Mercedes Benz E Class;
- Personal property contained in the 2014 Mercedes Benz E Class;
- \$19,749.00 currency seized from 2713 Sowerby Dr., Plano, Texas 75093;
- \$14,490.00 currency seized from Anastasiya Claire Lyons;



- Google table with case;
- Google nest controller device with broken screen;
- Brown leather suitcase with ammunition;
- Wooden crate containing boxes of ammunition;
- Brown rectangle thin metal cannister containing loose rounds of ammunition;
- Ziplock bag with a wooden box containing ammunition;
- Shipping box containing loose rounds of ammunition;
- Shipping box containing boxes of ammunition;
- Shipping box containing empty magazines;
- Shipping box containing ammunition and magazines with ammunition;
- Wooden crate containing boxes of ammunition;
- Rectangle metal cannister green in color containing loose rounds of ammunition;
- Plastic suitcase brown in color containing boxes of ammunition;
- Shipping box containing boxes of ammunition;
- Box containing boxes of ammunition;
- Go Pro Max;
- Go Pro black in color;
- 40mm rounds of ammunition with carrier;
- Two Faux 40mm launcher;
- Ballistic vest blue in color;
- Camo ballistic vest;
- Two (2) knives;
- Two (2) SD cards;
- USB white in color, Model G733;
- CPU tower black in color;
- Monitor black in color bearing serial number 0971HNKN904254N;
- ASUS laptop black in color bearing serial number N1NRCX12D48004B;
- CPU tower white in color;
- Extra-large monitor bearing serial number 0ECJHCSW600315E;
- Three magazines with ammunition;
- Body armor plate carrier with two ballistic plates; armor republic AR 500 armor;
- Two CDs for "susan;"
- Motorola cell phone;
- Huawei cell phone;
- Motorola cell phone black in color, IMEI: A000002253EF29;
- Samsung galaxy cell phone black in color, IMEI: 853639090660224;
- Verizon cell phone black in color, Model v20;
- Apple iPhone white in color, Model A1524, IMEI: 3592490601994;
- Verizon tablet, Model QMV7B;
- Samsung cell phone;

- Dji drone;
- Ballistic shield hardcore defense;
- Tattoo gun, packaged needle, and a packaged needle and ink set;
- Google cell phone;
- Sword black and gold in color;
- Three swords black and gold in color;
- Six 12 gauge shot gun shells;
- "ONN" USB 16gb black in color from master bedroom closet;
- Three micro SD cards, one full-size SD card, one memory stick;
- Laser;
- Lexar USB;
- Alltel slide cell phone;
- LG Metro PCS cell phone;
- Small video recorder with attached dongle;
- Moto Droid cell phone;
- Motorola Verizon cell phone, Model XT912;
- Google pixel cell phone;
- Microsoft cell phone;
- Kel-Tec 12 gauge shotgun, Model KSG, bearing serial number XYCA70 and accompanying gun bag;
- Microsoft dual screen cell phone and tablet;
- Samsung tablet black in color, Model A2378, serial number R52T40JLTRH;
- Google pixel cell phone black in color, cracked front screen contained in a black case;
- Apple cell phone rose gold in color, Model A1522, IMEI: 354385062313777;
- Apple iPad silver in color, model A2378, serial number HQQ7QHL24C;
- Receipt book;
- \$181.00 U.S. currency seized from master bedroom closet (shoebox);
- Vehicle bill of sale to Selena McCombs;
- Camera LRP;
- Nikon 5200 with SD card;
- \$16.00 U.S. currency seized from master bedroom closet (small safe);
- Unknown make and model flip cell phone black in color (with three cameras) IMEI: 357150460441050;
- Motorola razor flip phone;
- \$27.00 U.S. currency seized from master bedroom closet (small safe);
- U.S. currency in the amount of \$1,740.00;
- U.S. currency in the amount of \$17,785.00;
- Apple iPhone light blue in color, cracked front and back screen, contained in a light purple case;
- Apple iPhone blue in color (two cameras) contained in a case pink in color with flowers;

- Zastava arms magazine with 7.62 caliber ammunition;
- Zastava arms 7.62 caliber AK styled rifle, serial number 270-153530;
- One magazine containing 9mm ammunition;
- CD Defense 9mm, Model PAK-9, serial number R0N2023522;
- One magazine containing 9mm ammunition;
- Glock 9mm, Model 43x, serial number CAVN325;
- Apple iPhone black in color with a cracked front and back (unknown make and model, two cameras);
- USB white in color;
- Google pixel cell phone black in color;
- Smith & Wesson .357 magnum caliber revolver, Model 327, serial number DMD6755;
- Kel-Tec 5.7x28 caliber pistol, Model P50, serial number AAEC55;
- UTAS 12 gauge, Model UTS-15, serial number US12P19552;
- Sig Sauer multi caliber rifle, Model Sig MPX, serial number 62F005937;
- Arsenal 7.62 caliber weapon, Model SLR107R, serial number AC602198;
- Chiappa firearms Dayton Ohio .357 magnum caliber, Model Rhino, serial number RH05320;
- Kriss .45acp caliber weapon, Model Vector CRB, serial number 45C023907;
- CZ 9mm, Model CCP07, serial number D300881;
- Springfield armory 9mm weapon, Model XD9, serial number xd109818;
- H&K 9mm handgun, Model VP9, serial number 224-292071;
- Kel-Tec 9mm, Model Sub 2000, serial number FFZU97;
- Magazine with 7.62x39 ammunition;
- Century Arms, 7.62 x 39 caliber weapon, Model C39V2, serial number C39V2A37375;
- CZ 7.62 x 39 caliber weapon, Model Bren 2s, serial number D202396;
- Six (6) Remington shotgun shells;
- Remington 870 express 12 gauge shotgun, Model 870, serial number D802151M;
- CPU white in color, serial number 0120AC03238149;
- Knife black in color;
- HP Chromebook x360 laptop, bearing serial number 5CD0446KNT;
- Shock collar and remote;
- USB gold in color labeled 'goal zero;'
- Two magazines with ammunition, and one box of 9mm ammunition;
- CZ 9mm micro base pistol, Model Scorpion EVO 3 S2, serial number C956245;
- One magazine containing 9mm ammunition;
- CZ 9mm pistol, Model B105, Serial Number C931714;
- Kel-Tec 12 gauge shotgun, Model KS7, serial number Q5gG;
- FN .45ACP caliber pistol, Model FNX-45, serial number FX3U030442;



- Hudson 9mm pistol, Model MFC-H9, serial number H06679;
- PTR Industries 9mm weapon, Model PTR9, serial number 9MC006706;
- Maxim Defense .62 caliber weapon, serial number MXM-18-129467;
- Franchi 12 gauge shotgun, Model SPAS-12, serial number AA15910;
- Beretta 9mm handgun, Model 92FS, serial number BER827240;
- Beretta 9mm handgun, Model 92, serial number TX16458;
- Ruger 9mm revolver, Model LCR, serial number 549-52977;
- Four empty magazines;
- Kindle Amazon tablet, Model D01400 inside case;
- Windows 8 Pro Surface tablet, Model 1514;
- Dell laptop silver in color, service tag: G6TSX32;
- Three (3) empty magazines;
- Empty 3D printed magazine green in color;
- Rifle with serial number VX4102;
- Romarm 7.62 caliber weapon, serial number E-6514-76;
- Izhmash Saiga 12, serial number H09428043T;
- CZ handgun, Model CZS2, 9mm, serial number D310659;
- CZ handgun, Model CZ75B, 9mm, serial number 380;
- Magnum research, 50ae caliber, Model Desert Eagle, serial number DK0068044;
- Ruger .357 caliber handgun, Model GP100, serial number 170-04882;
- Iwi Jericho 941 9mm pistol, serial number J0009616;
- Spikes tactical multi-caliber, Model skull, serial number BSK000082;
- CEV Technologies 9mm pistol, Model OZ-9, serial number ZAO3227;
- Glock 9mm handgun, Model 48, serial number BRLT334;
- Tiran tactical 9mm handgun, Model STI combat master 2011, serial number TX08435;
- Chiappa Firearms Dayton Ohio .357 caliber, Model Rhino 60DS, serial number CFIT20H02441;
- Calico 9mm rifle, Model Liberty 100, serial number B003473;
- Mateba arms .44 magnum caliber semi-automatic revolver, Model Unica6, serial number 12068 or 001852;
- Zev technologies multi-caliber AR styled rifle, Model CEV-FL, serial number ZF104683;
- Cobalt Kinetics multi-caliber, Model BAMF, serial number B16C168;
- Remington Versa Max, 12 gauge shotgun, serial number RT30786B;
- FN Scar 7.62 caliber rifle, Model 17s. serial number H0C19580;
- Smith & Wesson .357 caliber revolver handgun, Model M&P R8, serial number DJB7697;
- Korth Night Hawk custom revolver, Model NXS 8-shot, serial number AH1754;
- Mossin Nagant revolver, Model 19995, 7.62 x 38 caliber, serial number 25749;

- Korth Night Hawk custom revolver, Model NXS 8-shot, serial number AH2773;
- Smith & Wesson revolver with attached scope, Model 500, 500 magnum caliber, serial number BCE9497;
- Lifepod lockbox black in color containing William Garland's license, vehicle registration, insurance, and a AAA card for Selena McCombs;
- Empty rifle magazine;
- Two rifle magazines containing rifle ammunition;
- Road runner bag black and red in color;
- 5.7 x 28 caliber magazine containing ammunition;
- Gun holster black in color;
- Charles Daly Chiappa honcho tactical pump 20 gauge firearm, serial number CD20PA20V-0042;
- FN Herstal 5.7x28 caliber, Model 57, serial number 386368154;
- Armored republic ballistic plates black in color;
- Baofeng walkie;
- Flip cell phone black in color;
- Five Remington shotgun slugs (5/8 oz shells);
- One round of ammunition;
- Daniel Defense multi-caliber pistol, Model DDM4, serial number DDM4258008;
- Taurus multi-caliber revolver, Model 4510 Judge, serial number A452791;
- Five rounds of defender ammunition;
- Four loaded magazines, 32 loose rounds of 9mm ammo, two boxes of Winchester 12 gauge ammo, one box of federal ammo, one box of Herters 9mm ammo, two boxes of 9mm ammo;
- Box containing package of zipties, tactical belts, tactical shotgun holder, pair of scissors, magazine band, empty magazine, magazine loader, and academy receipt;
- Sword with a plastic handle black in color;
- One cell phone belonging to William Garland;
- Two banker's boxes containing tattoo supplies;
- Tattoo kit red and black in color with sealed needles;
- Benelli 12 gauge shotgun, Model M4, serial number Y126016B20;
- Salient Arms multi-caliber rifle, Model SAI-T2, serial number SAI000500;
- FN Herstal Belgium 5.56 caliber weapon, Model FS2000, serial number 086102;
- FN 12 gauge, Model unknown, serial number FL020878;
- Daniel Defense 5.56 caliber semi-auto rifle, Model DDM4 v7, serial number DDM4312680;
- Zrodelta, multi-caliber rifle, Model Ready Series, serial number ZAR01760;
- H&K 9mm handgun, Model GMBH, serial number 84331;



- Kel-Tec 12 gauge shotgun, Model KSG, serial number XX6070;
- M249 5.56 caliber handgun, serial number 9348441;
- Israel Weapon Industries, Tavor 5.56 caliber weapon, Model x95, serial number T1007313;
- B&T 9mm machine pistol, Model TP9, serial number 20-34893;
- FN Herstal 5.7x28 caliber rifle, serial number FN086982;
- Sig Sauer multi-caliber handgun, Model Sig MPX Copperhead, serial number 62E006850;
- Springfield Armory 9mm handgun, Model Echelon, serial number BE235224 (with streamlight attached);
- Kel-Tec .22 cal handgun, Model PMR-30, serial number WXYC07;
- Beretta 9mm handgun, Model 92x, serial number BST30021;
- Magnum research .50 caliber handgun, Model Desert Eagle, serial number DK0032851;
- 9mm magazine containing ammunition;
- Glock 9mm handgun, Model 45, serial number BRKU357;
- 9mm magazine containing ammunition;
- Sig Sauer 9mm handgun, Model P365, serial number 66B390958;
- Long sword with a “t- handle” silver in color;
- Sword with a threaded handle black in color;
- Glock 9mm handgun, Model 34, serial number BNTM805;
- Sig Sauer 9mm handgun Model P320, serial number 58C279594;
- Glock 9mm handgun, Model 43, serial number bftn027;
- Black Apple iPhone with cracked back, and charger block with two (2) cords; and
- All such proceeds and/or instrumentalities are subject to forfeiture by the government.

If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendants:

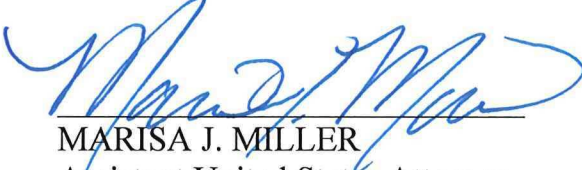
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property, which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above-forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

A TRUE BILL

  
\_\_\_\_\_  
GRAND JURY FOREPERSON

ABE MCGLOTHIN, JR.  
ACTING UNITED STATES ATTORNEY

  
\_\_\_\_\_  
MARISA J. MILLER  
Assistant United States Attorney

Date: 5/14/25

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FOR THE EASTERN DISTRICT OF TEXAS  
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a/k/a Harley	§	
ROBERTA MARIE KHAN (4)	§	
a/k/a Roberta Marie Khan,	§	
a/k/a Ember, a/k/a Scarecrow	§	
ANASTASIYA CLAIRE LYONS (5)	§	
a/k/a Frosty, a/k/a Elena Frost,	§	
a/k/a Ana Frost, a/k/a Bane,	§	
a/k/a Baiine	§	
	§	

**NOTICE OF PENALTY**

**Count One**

Violation: 18 U.S.C. §§ 2422(a) and 2

Penalty: Imprisonment for not more than twenty years; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$100.00

JVTA Assessment: \$5,000.00



**Count Two**

Violation: 18 U.S.C. § 1594(c)

Penalty: Imprisonment for not more than life; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$100.00

JVTA Assessment: \$5,000.00